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15 *Attorneys for Plaintiff United States of America*

16 (Names and addresses of attorneys continued on following pages)

17 UNITED STATES DISTRICT COURT
18 CENTRAL DISTRICT OF CALIFORNIA
19 WESTERN DIVISION

20 UNITED STATES OF AMERICA,
21
22 Plaintiff,
23
24 v.
25 CARRIER CORPORATION,
26
27 Defendant.

Case No. 2:05-CV-06022-ABC-FMO

**JOINT MOTION AND
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF
JOINT MOTION OF UNITED
STATES OF AMERICA, CARRIER
CORPORATION, AND UNITED
TECHNOLOGIES CORPORATION
TO AMEND CONSENT DECREE**

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10 *Attorneys for United Technologies Corporation and Carrier Corporation*

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1 **JOINT MOTION AND MEMORANDUM OF POINTS AND**
2 **AUTHORITIES IN SUPPORT**

3 The United States of America, United Technologies Corporation, and
4 Carrier Corporation (“UTC/Carrier,”) (collectively “the Parties”) hereby jointly
5 move to modify the First Amended Consent Decree entered in this matter on April
6 28, 2006, (“Consent Decree”) [Doc. No. 29], and in support thereof state as
7 follows:
8

- 9 1. The Consent Decree provides, among other things, for the implementation by
10 UTC/Carrier of a specified portion of an Interim Record of Decision (“Interim
11 ROD”) issued by the United States Environmental Protection Agency,
12 (“EPA”) under the Comprehensive Environmental Response, Compensation
13 and Liability Act (“CERCLA”).
14
15 2. The Consent Decree was executed by the Parties, submitted to public
16 comment, and entered as an Order of the Court on April 25, 2006.
17
18 3. Attached to the Consent Decree at Appendix D is the RD/RA Statement of
19 Work (“SOW”) which sets forth technical obligations for undertaking the
20 work defined under the Consent Decree.
21
22 4. Under Paragraph 118 of the Consent Decree the Court retains jurisdiction “for
23 the purpose of enabling any of the Parties to apply to the Court at any time for
24 such further order, direction, and relief as may be necessary or appropriate for
25 the . . . modification of this Consent Decree.”
26
27 5. The United States and UTC/Carrier, through their counsel and consultants
28 commenced months of analysis and detailed discussions pertaining to certain

1 obligations of UTC/Carrier under the Consent Decree and the work
2 documents created pursuant to it.

3 6. As a result of these discussions, the Parties have agreed on a proposed
4 modification of the Consent Decree as set forth at Exhibit A attached hereto.

5
6 7. The proposed modification to the Consent Decree would, in pertinent part,
7 allow for the creation and use of a Special Disbursement Account to pay for
8 carefully outlined capital expenses for the construction of a remedy for
9 Hexavalent Chromium contamination to be used only in the event that such
10 treatment is found to be necessary.

11
12 8. The Parties agree that making the proposed modification to the Consent
13 Decree would be fair, reasonable, and consistent with CERCLA by removing
14 a potential barrier to the expeditious performance of one portion of
15 UTC/Carrier's obligations under the Consent Decree. *U.S. v. Montrose Chem.*
16 *Corp.*, 50 F.3d 741, 746 (9th Cir. 1995), quoting *U.S. v. Cannons Eng'g Corp.*,
17 899 F.2d 79, 84 (1st Cir. 1990).

18
19 9. Paragraph 122 of the Amended Consent Decree allows for modification to
20 non-material terms of the SOW by agreement of the Parties.

21 10. As a result of discussions described above, the Parties have further agreed to
22 the modifications to the SOW as set forth at Exhibit B attached hereto.

23
24 11. The modifications to the SOW in pertinent part involve technical
25 specifications of location and frequency of groundwater sampling, and
26 provide a preview of chemical specific discharge limits for reinjection based
27 on requirements (ARARs ("Applicable or Relevant and Appropriate
28 Requirements") and TBCs ("To Be Considered")) that EPA intends to attach

1 to an Explanation of Significant Differences from the Interim ROD to be
2 issued in the near future.

3 12. These agreed-upon modifications to the SOW are not material and may be
4 made by agreement pursuant to Paragraph 122 of the Amended Consent
5 Decree.
6

7 13. The modifications to the Consent Decree and SOW are not intended to impact
8 the rights or obligations of any non-party to this Consent Decree.

9 WHEREFORE the parties jointly request:

- 10 i. The Consent Decree be amended as set forth in Exhibit A hereto;
- 11 ii. Appendix D of the Consent Decree, the "RD/RA Statement of Work," be
- 12 amended as set forth in Exhibit B hereto; and
- 13
- 14 iii. Such further relief as the Court deems appropriate.

15 A proposed order is attached.

16 Respectfully submitted,
17 **FOR THE UNITED STATES OF**
18 **AMERICA**

19 JEFFREY BOSSERT CLARK
20 Assistant Attorney General

21
22 March 8, 2019
23 Date

24 /s/ Elise S. Feldman
25 ELISE S. FELDMAN
26 Senior Counsel
27 Environmental Enforcement Section
28 Environment and Natural Resources
Division
U.S. Department of Justice
301 Howard Street, Suite 1050
San Francisco, California 94105

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Pursuant to L.R. 5-4.3.4(a)(2)(ii), I hereby certify that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing. /s/ Elise S. Feldman

**FOR UNITED TECHNOLOGIES
CORPORATION AND CARRIER
CORPORATION:**

March 8, 2019
Date

/s/ John P. Krill, Jr.
JOHN P. KRILL, JR. (pro hac vice; PA
16287)
CHRISTINA GOODRICH
(SBN261722)
K&L GATES LLP
10100 Santa Monica Blvd., 7thFloor
Los Angeles, California 90067

PROOF OF SERVICE

United States of America v. Carrier Corporation

United States District Court, Central District of California

Case No.: 2:05-CV-06022-ABC-FMO

I am an attorney at the United States Department of Justice Environmental Enforcement Section. My business address is 301 Howard Street, Suite 1050, San Francisco, CA 94105. I am over the age of 18 years and not a party to this action.

I hereby certify that on March 8, 2019, I electronically filed the following documents with the Clerk of the Court using CM/ECF, thereby serving these documents on all counsel who have appeared via the Court’s electronic filing system.

**JOINT MOTION AND MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF JOINT MOTION OF UNITED STATES
OF AMERICA, CARRIER CORPORATION, AND UNITED
TECHNOLOGIES CORPORATION TO AMEND CONSENT DECREE
PROPOSED ORDER**

I also certify that I sent via Federal Express two-day service a paper copy of these documents to counsel at the following address:

John P. Krill, Jr.
Senior Counsel
K&L Gates
17 North Second Street, 18th Fl
Harrisburg, PA 17101-1507

/s/ Elise S. Feldman
ELISE S. FELDMAN

EXHIBIT A

- 1. The Consent Decree is amended by adding the following definition on Page 7 line 5, to read as follows:**

“Modification Effective Date,” shall mean the date on which the Court enters an order granting the Joint Motion of the United States of America, Carrier Corporation, and United Technologies Corporation to Modify the Consent Decree which was filed with the court on March 8, 2019.

- 2. The Consent Decree is amended by adding Section XVI-A, which reads as follows:**

XVI-A. DISBURSEMENT OF SPECIAL ACCOUNT FUNDS

58A. Creation of the San Gabriel Valley Superfund Site, Area 4 (“PVOU”), Disbursement Special Account and Agreement to Disburse Funds to Settling Defendants.

Within 60 days after the Modification Effective Date, EPA shall establish the PVOU Disbursement Special Account and shall transfer five million dollars (\$5,000,000) from the Puente Valley Operable Unit Special Account to the Shallow Zone North PVOU Disbursement Special Account. Subject to the terms and conditions set forth in this Section, EPA agrees to make the funds in the Shallow Zone North PVOU Disbursement Special Account, including Interest Earned on the funds in the Shallow Zone North PVOU Disbursement Special Account, available for disbursement to Settling Defendants as reimbursement for design and construction costs of the portion(s) of the Interim Remedy for the treatment of hexavalent chromium, if any such treatment is required by EPA. Such design and construction costs shall include:

- (1) Engineering analysis and reporting,
- (2) Cost-benefit analysis and reporting,
- (3) Pilot testing,
- (4) Feasibility study and reporting,
- (5) Permitting,
- (6) Engineering design,
- (7) Vendor selection,
- (8) Procurement of equipment and materials for construction and installation,
- (9) Delivery,

- (10) Assembly and installation,
- (11) Shakedown,
- (12) Equipment upgrades, retrofits, and repairs performed prior to O&F determination or, if after the O&F determination EPA requires hexavalent chromium treatment, prior to any later start-up of a chromium treatment system,
- (13) Labor, capital, utilities, waste disposal, fees, and laboratory analysis, and
- (14) Project management for the above listed items.

EPA shall disburse funds from the Shallow Zone North PVOU Disbursement Special Account to Settling Defendants in accordance with the procedures and milestones for phased disbursement set forth in this Section.

58B. Timing, Amount, and Method of Disbursing Funds From the Shallow Zone North PVOU Disbursement Special Account.

Within 60 days after EPA's receipt of a Cost Summary and Certification, as defined by ¶ 58C, or if EPA has requested additional information under ¶ 58C or a revised Cost Summary and Certification under ¶ 58C, within 30 days after receipt of the additional information or revised Cost Summary and Certification, and subject to the conditions set forth in this Section, EPA shall disburse the funds from the Shallow Zone North PVOU Disbursement Special Account requested by Settling Defendants at the completion of the following milestones: (1) EPA approval of the Final Design Report; and (2) EPA certification of Operational and Functional.

EPA shall disburse the funds from the Shallow Zone North PVOU Disbursement Special Account to Settling Defendants in accordance with written instructions from Settling Defendants' approved Supervising Contractor.

58C. Requests for Disbursement of Shallow Zone North PVOU Special Account Funds

Within 45 days after issuance of EPA's written confirmation that a milestone of the Work, as defined in ¶ 58B (Timing, Amount, and Method of Disbursing Funds), has been satisfactorily completed, Settling Defendants shall submit to EPA a Cost Summary and Certification covering the Work performed up to the date of completion of that milestone. Settling Defendants shall not include in any submission costs included in a previous Cost Summary and Certification following completion of an earlier milestone of the Work if those costs have been previously sought or reimbursed pursuant to ¶ 58B.

Each Cost Summary and Certification shall include a complete and accurate written cost summary and certification of the necessary costs incurred and paid by Settling Defendants for the Work covered by the particular submission, excluding costs not eligible for disbursement under ¶ 58D (Costs Excluded from Disbursement). Each Cost Summary and Certification shall contain the following statement signed by a duly authorized corporate representative:

To the best of my knowledge, after thorough investigation and review of Settling Defendants' documentation of costs incurred and paid for Work performed pursuant to this Consent Decree [**insert, as appropriate:** "up to the date of completion of milestone 1," "between the date of completion of milestone 1 and the date of completion of milestone 2," or "between the date of completion of milestone 2 and the date of completion of the milestone 3,"] I certify that the information contained in or accompanying this submission is true, accurate, and complete. I am aware that there are significant penalties for knowingly submitting false information, including the possibility of fine and imprisonment.

The duly authorized corporate representative shall also provide EPA a list of the documents that he or she reviewed in support of the Cost Summary and Certification. Upon request by EPA, Settling Defendants shall submit to EPA any additional information that EPA deems necessary for its review and approval of a Cost Summary and Certification.

If EPA finds that a Cost Summary and Certification includes a mathematical error, costs excluded under ¶ 58D (Costs Excluded from Disbursement), costs that are inadequately documented, or costs submitted in a prior Cost Summary and Certification, it will notify Settling Defendants and provide them an opportunity to cure the deficiency by submitting a revised Cost Summary and Certification. If Settling Defendants fail to cure the deficiency within 30 days after being notified of, and given the opportunity to cure, the deficiency, EPA will recalculate Settling Defendants' costs eligible for disbursement for that submission and disburse the corrected amount to Settling Defendants in accordance with the procedures in ¶ 58B (Timing, Amount, and Method of Disbursing Funds). Settling Defendants may dispute EPA's recalculation under this Paragraph pursuant to Section XX (Dispute Resolution). In no event shall Settling Defendants be disbursed funds from the Shallow Zone North PVOU Disbursement Special Account in excess of amounts properly documented in a Cost Summary and Certification accepted or modified by EPA.

58D. Costs Excluded from Disbursement.

The following costs are excluded from, and shall not be sought by Settling Defendants for, disbursement from the Shallow Zone North PVOU Disbursement Special Account: Any cost not specifically identified in Paragraph 58A above.

58E. Termination of Disbursements from the Special Account. EPA's obligation to disburse funds from the Shallow Zone North PVOU Disbursement Special Account under this Consent Decree shall terminate upon EPA's determination that Settling Defendants: (a) have knowingly submitted a materially false or misleading Cost Summary and Certification; (b) have submitted a materially inaccurate or incomplete Cost Summary and Certification, and have failed to correct the materially inaccurate or incomplete Cost Summary and Certification within 30 days after being notified of, and given the opportunity to cure, the deficiency; or (c) failed to submit a Cost Summary and Certification as required by ¶ 58C (Requests for Disbursement of Special Account Funds) within 30 days (or such longer period as EPA agrees) after being notified that EPA intends to terminate its obligation to make disbursements pursuant to this Section because of Settling Defendants' failure to submit the Cost Summary and Certification as required by ¶ 58C. EPA's obligation to disburse funds from the Shallow Zone North PVOU Disbursement Special Account shall also terminate upon EPA's assumption of performance of any portion of the Work pursuant to ¶ 99 (Work Takeover), when such assumption of performance of the Work is not challenged by Settling Defendants or, if challenged, is upheld under Section XX (Dispute Resolution). In addition, EPA's obligation to disburse funds from the Shallow Zone North PVOU Disbursement Special Account shall also terminate upon a determination by EPA that it will not require construction of a remedy for the treatment of hexavalent chromium as a part of this Interim Remedy. Settling Defendants may dispute EPA's termination of special account disbursements under Section XX.

58F. Recapture of Special Account Disbursements. Upon termination of disbursements from the Shallow Zone North PVOU Disbursement Special Account under ¶ 58E (Termination of Disbursements from the Special Account), if EPA has previously disbursed funds from the Shallow Zone North PVOU Disbursement Special Account for activities specifically related to the reason for termination, e.g., discovery of a materially false or misleading submission after disbursement of funds based on that submission, EPA shall submit a bill to Settling Defendants for those amounts already disbursed from the Shallow Zone North PVOU Disbursement Special Account specifically related to the reason for termination, plus Interest on that amount covering the period from the date of disbursement of

the funds by EPA to the date of repayment of the funds by Settling Defendant. Within 45 days after receipt of EPA's bill, Settling Defendants shall reimburse the EPA Hazardous Substance Superfund for the total amount billed. Payment shall be made in accordance with ¶ 55(b) (instructions for future response cost payments). Upon receipt of payment, EPA may deposit all or any portion thereof in the Puente Valley Operable Unit Special Account, the Shallow Zone North PVOU Disbursement Special Account, or the EPA Hazardous Substance Superfund. The determination of where to deposit or how to use the funds shall not be subject to challenge by Settling Defendants pursuant to the dispute resolution provisions of this Consent Decree or in any other forum. Settling Defendants may dispute EPA's determination as to recapture of funds pursuant to Section XX (Dispute Resolution).

58G. Balance of Special Account Funds. After EPA completes all disbursement to Settling Defendants in accordance with this Section, or if EPA determines that it will not require construction of a remedy for the treatment of hexavalent chromium as a part of this Interim Remedy, if any funds remain in the Shallow Zone North PVOU Disbursement Special Account, EPA may transfer such funds to the Puente Valley Operable Unit Special Account or to the EPA Hazardous Substance Superfund. Any transfer of funds to the Puente Valley Operable Unit Special Account or the EPA Hazardous Substance Superfund shall not be subject to challenge by Settling Defendants pursuant to the dispute resolution provisions of this Consent Decree or in any other forum.

EXHIBIT B

The RD/RA Statement of Work, attached as Appendix D to the Consent Decree, is amended and restated as follows:

Page 3 – Paragraph 5

DELETE:

The Settling Defendants will also not initially install one of the extraction wells in EPA's design. This well is designated as S-1 on Figure 2 of this SOW. Instead, the Settling Defendants will propose a network of Westernmost Plume Area shallow zone monitoring wells and sample these wells quarterly for the first two years to determine if lateral and vertical containment of the plume is required in the shallow zone using the process described below.

AND REPLACE WITH:

Specifically, and irrespective of other references to "quarterly" sampling in this SOW, the Settling Defendants will conduct the following Interim Remedial Action in the plume areas:

A. Eastern Plume: The Settling Defendants will extract and treat groundwater from a total of three extraction wells, S-5, S-6 and S-7, or such alternative wells as may be proposed by the Settling Defendants and approved by EPA. Until the Interim Remedial Action reaches the Operational & Functional Date, the Settling Defendants shall conduct groundwater monitoring on an annual basis. Once the Interim Remedial Action has reached the Operational & Functional Date, the Settling Defendants will conduct groundwater monitoring under the EPA approved Compliance/General Monitoring Plan(s) to monitor the effectiveness of the extraction and treatment activities in meeting the Performance Criteria.

B. Western Plume: The Settling Defendants will not be required to extract and treat groundwater unless the results of future groundwater monitoring conducted under EPA-approved Compliance/General Monitoring Plan(s) demonstrate that extraction is necessary to meet the Performance Criteria. Until the Interim Remedial Action reaches the Operational & Functional Date, the Settling Defendants shall conduct groundwater monitoring on an annual basis. Once the Interim Remedial Action has reached the Operational & Functional Date, the Settling Defendants will conduct

groundwater monitoring under the EPA approved Compliance/General Monitoring Plan(s) to monitor compliance in meeting the Performance Criteria.

- C. Middle Plume: The Settling Defendants will not be required to extract and treat groundwater unless the results of future groundwater monitoring conducted under the EPA-approved Compliance/General Monitoring Plan(s) demonstrate that groundwater extraction is necessary to meet the Performance Criteria.

Until the Interim Remedial Action reaches the Operational & Functional Date, the Settling Defendants shall conduct groundwater monitoring on an annual basis. Once the Interim Remedial Action has reached the Operational & Functional Date, the Settling Defendants will conduct groundwater monitoring under the EPA approved Compliance/General Monitoring Plan(s) to monitor compliance in meeting the Performance Criteria.

- D. Westernmost Plume: The Settling Defendants will not be required to extract and treat groundwater unless the results of future groundwater monitoring activities conducted under EPA-approved Compliance/General Monitoring Plan(s) demonstrate that extraction is necessary to meet the Performance Criteria. Until the Interim Remedial Action reaches the Operational and Functional Date, the Settling Defendants shall conduct groundwater monitoring on an annual basis. Once the Remedial Action has reached the Operational & Functional Date, the Settling Defendants shall conduct groundwater monitoring under the EPA approved Compliance/General Monitoring Plan(s) to monitor compliance in meeting the Performance Criteria.

- E. Mid-Valley Monitoring: Until the Interim Remedial Action reaches the Operational & Functional Date, the Settling Defendants shall conduct groundwater monitoring on an annual basis. Once the Interim Remedial Action has reached the Operational & Functional Date, the Settling Defendants will conduct groundwater monitoring under the EPA approved Compliance/General Monitoring Plan(s).

Page 3 – Paragraph 7

DELETE:

The extraction well system will commence operation on a schedule to be approved by EPA. EPA may delay startup of operation of the system until extraction commences south of Puente Creek.

AND REPLACE WITH:

The extraction well system will commence operation on a schedule to be approved by EPA. Upon request of the Settling Defendants, EPA may allow the Settling Defendants to delay startup of operation of the system until extraction commences south of Puente Creek.

Page 5 – Paragraphs 1 and 2

DELETE:

Also, the Settling Defendants shall monitor the Westernmost Plume Area (see Figure 1 of this SOW) for 2 years to determine if lateral and vertical containment of the plume is required in the shallow zone. If, after two years of monitoring, EPA determines that containment is not necessary to prevent shallow zone groundwater in the Westernmost Plume Area with greater than 10-times the levels listed in Table 2 of Attachment 1 of the ESD from (1) migrating beyond its lateral and vertical extent as measured at the end of the two year monitoring period; and (2) migrating vertically into the intermediate zone, then Settling Defendants shall continue monitoring to ensure that containment activities are not required until the eight-year anniversary of the Operational and Functional Date established pursuant to Paragraph 50 of the Decree. If containment of the Westernmost Plume Area is required at any time after the two year monitoring period, then the Settling Defendants shall install the necessary extraction, compliance, sentinel and monitoring wells and treatment system to ensure that the Performance Criteria are met until the eight-year anniversary of the Operational and Functional Date established pursuant to Paragraph 50 of the Decree.

Initial remedial design work shall focus on the installation of extraction, compliance and sentinel wells in the shallow zone at the mouth of the Puente Valley, and monitoring wells in the Mid-Valley Area, and the Westernmost Plume Area.

AND REPLACE WITH: [No replacement language.]

Page 5, final paragraph

DELETE:

The Settling Defendants shall monitor compliance with this criterion at a minimum of eight (8) EPA approved compliance wells that meet the following requirements:

AND REPLACE WITH:

The Settling Defendants shall monitor compliance with this criterion at wells that meet the following requirements:

Page 9 – Paragraph 1

INSERT AFTER #1 AS NEW #1A:

1A. For reinjection to groundwater of extracted and treated groundwater, treatment systems shall be designed and operated to reduce the concentrations of contaminants to levels at or below chemical specific discharge levels required for reinjection pursuant to ARARs and TBC levels. Table A attached hereto is a table setting forth the chemical specific discharge limits based upon ARARs and TBC levels that EPA anticipates will be required for reinjection. EPA anticipates issuing an Explanation of Significant Differences (ESD) allowing for potential reinjection of treated groundwater. A final table setting forth the required discharge limits will be attached to the ESD.

Page 10, last paragraph, fifth sentence

DELETE:

After installation and sufficient sampling of each proposed compliance well (no fewer than eight) and sentinel wells, EPA shall determine whether each well, proposed in the plan by the Settling Defendants, is acceptable for its proposed use.

AND REPLACE WITH:

After installation and sufficient sampling of each proposed compliance well and sentinel well, EPA shall determine whether each well, proposed in the plan by the Settling Defendants, is acceptable for its proposed use.

Page 35

INSERT BEFORE TABLE:

A revised RD Work Plan shall be submitted to EPA within 30 days of the Modification Effective Date.

EXHIBIT B – TABLE A
DRAFT CHEMICAL
SPECIFIC ARARs/TBCs

Table A
DRAFT Chemical Specific ARARs/TBCs

	A	D	E	F	G	H
1	Constituent	Groundwater Reinjection Limit (µg/L)	Reference Limit (µg/L)	USEPA ARAR Reference ¹	LARWQCB Injection Discharge Option (6/29/2017 Letter from LARWQCB to EPA Attachment 2: Limitations Applicable for Discharges to Land (Reinjection))	
2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
3	DRAFT - Discharge Requirements for Reinjection (Oct 10, 2018)					
4	Organic Compounds					
5	Target Compound List Volatiles					
6	Acrolein			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
7	Acrylonitrile			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
8	Acetone (see USEPA note)			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
9	Benzene	1	1	CA Primary MCL (A)	1	Table 2.3; MCL
10	Bromodichloromethane	100	100	USEPA Primary MCL (C)	No LARWQCB Limit	No LARWQCB Limit
11	Bromoform	100	100	USEPA Primary MCL (C)	No LARWQCB Limit	No LARWQCB Limit
12	Bromomethane	50	50	Drinking Water Equivalent Level (I)	No LARWQCB Limit	No LARWQCB Limit
13	n-Butyl benzene	260	260	CA SWRCB Drinking Water NL (F) TBC	260	Table 2.5; NL
14	sec-Butyl benzene	260	260	CA SWRCB Drinking Water NL (F) TBC	260	Table 2.5; NL
15	tert-Butyl benzene	260	260	CA SWRCB Drinking Water NL (F) TBC	260	Table 2.5; NL
16	Carbon Disulfide	160	160	CA SWRCB Drinking Water NL (F) TBC	160	Table 2.5; NL
17	Carbon Tetrachloride	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL
18	Chlorate	800	800	CA SWRCB Drinking Water NL (F) TBC	800	Table 2.3; MCL
19	Chlorobenzene	70	70	CA Primary MCL (A)	No LARWQCB Limit	No LARWQCB Limit
20	Chloroethane	16	16	Other Taste and Odor (H)	No LARWQCB Limit	No LARWQCB Limit
21	Chloroform	100	100	CA/USEPA Primary MCL (A,C)	No LARWQCB Limit	No LARWQCB Limit
22	Chloromethane			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
23	2-Chlorotoluene	140	140	CA SWRCB Drinking Water NL (F) TBC	140	Table 2.5; NL
24	4-Chlorotoluene	140	140	CA SWRCB Drinking Water NL (F) TBC	140	Table 2.5; NL
25	Cyclohexane			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
26	Dibromochloromethane	100	100	CA/USEPA Primary MCL (A,C)	No LARWQCB Limit	No LARWQCB Limit
27	Dibromochloropropane (DBCP)	0.2	0.2	CA/USEPA Primary MCL (A,C)	0.2	Table 2.3: MCL (1,2-dibromo-3-chloropropane)
28	1,2-Dibromoethane (EDB)	0.05	0.05	CA/USEPA Primary MCL (A)	0.05	Table 2.3; MCL (Ethylene Dibromide)
29	1,2-Dichlorobenzene	600	600	CA/USEPA Primary MCL (A,C)	600	Table 2.3; MCL
30	1,3-Dichlorobenzene	600	600	CA SWRCB Action Level (G)	No LARWQCB Limit	No LARWQCB Limit
31	1,4-Dichlorobenzene	5	5	CA Primary MCL (A)	5	Table 2.3; MCL
32	Dichlorodifluoromethane	1,000	1,000	CA SWRCB Drinking Water NL (F) TBC	1,000	Table 2.5; NL
33	Dichlorofluoromethane (see USEPA)			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
34	1,1-Dichloroethane	5	5	CA Primary MCL (A)	5	Table 2.3; MCL
35	1,2-Dichloroethane	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL

Table A
DRAFT Chemical Specific ARARs/TBCs

	A	D	E	F	G	H
1	Constituent	Groundwater Reinjection Limit (µg/L)	Reference Limit (µg/L)	USEPA ARAR Reference ¹	LARWQCB Injection Discharge Option (6/29/2017 Letter from LARWQCB to EPA Attachment 2: Limitations Applicable for Discharges to Land (Reinjection))	
2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
36	1,1-Dichloroethylene	6	6	CA Primary MCL (A)	6	Table 2.3; MCL
37	cis-1,2-Dichloroethylene	6	6	CA Primary MCL (A)	6	Table 2.3; MCL
38	trans-1,2-Dichloroethylene	10	10	CA Primary MCL (A)	10	Table 2.3; MCL
39	Dichloromethane (methylene chloride)	5	5	CA Primary MCL (A)	5	Table 2.3; MCL
40	1,2-Dichloropropane	5	5	CA/USEPA Primary MCL (A)	5	Table 2.3; MCL
41	cis-1,3-Dichloropropene	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL. Not split into cis and trans in Table 2.3
42	trans-1,3-Dichloropropene	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL. Not split into cis and trans in Table 2.3
43	Ethylbenzene	300	30	USEPA Secondary MCL – proposed (D)	300	Table 2.3; MCL
44	Ethylene glycol	14,000	14,000	CA SWRCB Drinking Water NL (F) TBC	14,000	Table 2.5; NL
45	Formaldehyde	100	100	CA SWRCB Drinking Water NL (F) TBC	100	Table 2.5; NL
46	2-Hexanone				No LARWQCB Limit	No LARWQCB Limit
47	HMX	350	350	CA SWRCB Drinking Water NL (F) TBC	350	Table 2.5; NL
48	Isopropyl alcohol (Isopropanol)			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
49	Isopropylbenzene	770	770	CA SWRCB Drinking Water NL (F) TBC	770	Table 2.5; NL
50	Methyl acetate			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
51	Methyl bromide			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
52	Methyl ethyl ketone (2-butanone)				No LARWQCB Limit	No LARWQCB Limit
53	Methyl isobutyl ketone (MIBK)	120	120	CA SWRCB Drinking Water NL (F)	120	Table 2.5; NL
54	Methylcyclohexane			SRWCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
55	n-Propylbenzene	260	260	CA SWRCB Drinking Water NL (F) TBC	260	Table 2.5; NL
56	RDX	0.3	0.3	CA SWRCB Drinking Water NL (F) TBC	0.3	Table 2.5; NL
57	Styrene	100	10	USEPA Secondary MCL – proposed (D)	100	Table 2.3; MCL
58	1,1,2,2-Tetrachloroethane	1	1	CA Primary MCL (A)	1	Table 2.3; MCL
59	Tetrachloroethylene (PCE)	5	5	CA/USEPA Primary MCL (A)	5	Table 2.3; MCL
60	Toluene	150	40	USEPA Secondary MCL – proposed (D)	150	Table 2.3; MCL
61	1,2,4-Trichlorobenzene	5	5	CA PHG (E)	5	Table 2.3; MCL
62	1,1,1-Trichloroethane	200	200	CA Primary MCL (A)	200	Table 2.3; MCL
63	1,1,2-Trichloroethane	5	5	CA Primary MCL (A)	5	Table 2.3; MCL
64	Trichloroethylene (TCE)	5	5	CA/USEPA Primary MCL (A)	5	Table 2.3; MCL
65	Trichlorofluoromethane	150	150	CA Primary MCL (A)	150	Table 2.3; MCL
66	1,1,2-Trichloro-1,2,2-trifluoroethane	1,200	1,200	CA Primary MCL (A)	1,200	Table 2.3; MCL
67	1,2,4-Trimethylbenzene	330	330	CA SWRCB Drinking Water NL (F) TBC	330	Table 2.5; NL
68	1,3,5-Trimethylbenzene	330	330	CA SWRCB Drinking Water NL (F) TBC	330	Table 2.5; NL
69	2,4,6-Trinitrotoluene (TNT)	1	1	CA SWRCB Drinking Water NL (F) TBC	1	Table 2.5; NL
70	Vinyl chloride	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL

Table A
DRAFT Chemical Specific ARARs/TBCs

	A	D	E	F	G	H
1	Constituent	Groundwater Reinjection Limit (µg/L)	Reference Limit (µg/L)	USEPA ARAR Reference ¹	LARWQCB Injection Discharge Option (6/29/2017 Letter from LARWQCB to EPA Attachment 2: Limitations Applicable for Discharges to Land (Reinjection))	
2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
71	Xylene(s)	1,750	20	USEPA Secondary MCL – proposed (D)	1,750	Table 2.3; MCL
72	Additional Volatiles					
73	Methyl tert-butyl ether (MTBE)	13	5	CA Secondary MCL (B)	13/5	Table 2.3 (MCL)/Table 2.4 (SMCL)
74	Emerging Contaminants					
75	1,2,3-Trichloropropane (1,2,3-TCP)	0.005	0.005	CA Primary MCL (A)	0.005	Table 2.5; NL now MCL
76	1,4-Dioxane	1	1	CA SWRCB Drinking Water NL (F) TBC	1	Table 2.5; NL
77	N-Nitrosodimethylamine (NDMA)	0.01	0.01	CA SWRCB Drinking Water NL (F) TBC	0.01	Table 2.5; NL
78	Other Organic Parameters					
79	Total Organic Carbon (TOC)				No LARWQCB Limit	No LARWQCB Limit
80	Biological Oxygen Demand (BOD)				No LARWQCB Limit	No LARWQCB Limit
81	Chemical Oxygen Demand (COD)				No LARWQCB Limit	No LARWQCB Limit
82	Inorganic Compounds					
83	TAL Metals					
84	Aluminum	1,000	200	CA/USEPA Secondary MCL (B,D)	1000/200	Table 2.1, MCL/Table 2.4 SMCL
85	Antimony	6	6	CA/USEPA Primary MCL (A,C)	6	Table 2.1, MCL
86	Arsenic	10	10	CA/USEPA Primary MCL (A, C)	10	Table 2.1, MCL
87	Barium	1,000	1,000	CA Primary MCL (A)	1,000	Table 2.1, MCL
88	Beryllium	4	4	CA/USEPA Primary MCL (A,C)	4	Table 2.1, MCL
89	Cadmium	5	5	CA/USEPA Primary MCL (A,C)	5	Table 2.1, MCL
90	Calcium				No LARWQCB Limit	No LARWQCB Limit
91	Chromium (total)	50	50	CA Primary MCL (A)	50	Table 2.1, MCL
92	Cobalt				No LARWQCB Limit	No LARWQCB Limit
93	Copper	1,000	1,300	CA/USEPA Primary MCL (A,C)	1,000	Table 2.4; SMCL
94	Iron	300	300	CA/USEPA Secondary MCL (B,D)	300	Table 2.4: SMCL
95	Lead	15	15	CA/USEPA Primary MCL (A,C)	No LARWQCB Limit	No LARWQCB Limit
96	Magnesium				No LARWQCB Limit	No LARWQCB Limit
97	Manganese	50	50	CA/USEPA Secondary MCL (B,D)	50/500	Table 2.4 (SMCL)/Table 2.5 (NL)
98	Mercury	2	2	CA/USEPA Primary MCL (A,C)	2	Table 2.1; MCL
99	Molybdenum				No LARWQCB Limit	No LARWQCB Limit
100	Nickel	100	100	CA Primary MCL (A)	100	Table 2.1; MCL
101	Potassium				No LARWQCB Limit	No LARWQCB Limit
102	Selenium	50	50	CA/USEPA Primary MCL (A,C)	50	Table 2.1; MCL
103	Silver	100	100	CA/USEPA Secondary MCL (B,D)	100	Table 2.4; SMCL
104	Sodium				No LARWQCB Limit	No LARWQCB Limit
105	Thallium	2	2	CA/USEPA Primary MCL (A,C)	2	Table 2.1; MCL
106	Vanadium	50	50	CA SWRCB Drinking Water NL (F) TBC	50	Table 2.5; NL
107	Zinc	5,000	5,000	CA/USEPA Secondary MCL (B,D)	5,000	Table 2.5; NL

Table A

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2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
108	Additional Inorganics					
109	Boron	500 or Background	500	LA Basin Plan - Main San Gabriel Basin (J)	500 or Background	Paragraph B of 12/19/13 Letter
110	Silicon				No LARWQCB Limit	No LARWQCB Limit
111	Cyanide	150	150	CA Primary MCL (A)	150	Table 2.1; MCL
112	pH	6.5 to 8.5	6.5 to 8.5	USEPA Secondary MCL (D)	No LARWQCB Limit	No LARWQCB Limit
113	Ammonia	500	500	Other Tastes and Odors (H)	No LARWQCB Limit	No LARWQCB Limit
114	Bromide				No LARWQCB Limit	No LARWQCB Limit
115	Chloride	100,000 or Background	100,000	LA Basin Plan - Main San Gabriel Basin (J)	100,000 or Background	Paragraph B of 12/19/13 Letter
116	Fluoride	2,000	2,000	CA/USEPA Primary MCL (A,C)	2,000	Table 2.1; MCL
117	Nitrate+Nitrite (NO ₂ as N and NO ₃ as N)	10,000 or Background	10,000	NPDES Order No. R4-2014-0187 WDRs for nitrate and	10,000 or Background	Paragraph B of 12/19/13 Letter
118	Nitrate (NO ₃ as N)	10,000 or Background	10,000	NPDES Order No. R4-2014-0187 WDRs for nitrate and	10,000 or Background	Paragraph B of 12/19/13 Letter
119	Nitrite (NO ₂ as N)	1,000 or Background	1,000	NPDES Order No. R4-2014-0187 WDRs	1,000 or Background	Paragraph B of 12/19/13 Letter
120	Nitrate (as NO ₃)	45,000	45,000	CA PHG (E)	45,000	Table 2.1; MCL
121	Total Kjeldahl Nitrogen (TKN)				No LARWQCB Limit	No LARWQCB Limit
122	Phosphorus (orthophosphate, total)				No LARWQCB Limit	No LARWQCB Limit
123	Sulfate	100,000 or Background	250,000	CA Secondary MCL (B)	100,000 or Background	Paragraph B of 12/19/13 Letter
124	Total dissolved solids (TDS) (11)	600,000 or Background	600,000	LA Basin Plan - Main San Gabriel Basin, Eastern (J)	600,000 or Background	Paragraph B of 12/19/13 Letter
125	Alkalinity				No LARWQCB Limit	No LARWQCB Limit
126	Total Suspended Solids (TSS)				No LARWQCB Limit	No LARWQCB Limit
127	Oil and Grease				No LARWQCB Limit	No LARWQCB Limit
128	Sulfide				No LARWQCB Limit	No LARWQCB Limit
129	Residual Chlorine				No LARWQCB Limit	No LARWQCB Limit
130	Methylene Blue Active Substances	500	500	CA Secondary MCL (B)	500	Table 2.4; SMCL
131	Emerging Contaminants					
132	Hexavalent Chromium	10	10	CA Primary MCL (A) ³	10	Table 2.1; MCL
133	Perchlorate	6	6	CA Primary MCL (A)	6	Table 2.1; MCL
134	Pesticides and PCBs					
135	4,4-DDD				No LARWQCB Limit	No LARWQCB Limit
136	4,4-DDE				No LARWQCB Limit	No LARWQCB Limit
137	Aldrin				No LARWQCB Limit	No LARWQCB Limit
138	alpha-BHC				No LARWQCB Limit	No LARWQCB Limit
139	beta-BHC				No LARWQCB Limit	No LARWQCB Limit
140	Endosulfan Sulfate				No LARWQCB Limit	No LARWQCB Limit
141	Endrin Aldehyde				No LARWQCB Limit	No LARWQCB Limit
142	Gamma-BHC				No LARWQCB Limit	No LARWQCB Limit
143	PCBs	0.5	0.5	CA Primary MCL (A)	0.5	Table 2.3; MCL
144	Pentachlorophenol	1	1	CA Primary MCL (A)	1	Table 2.3; MCL

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2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
145	Chlordane	0.1	0.1	CA Primary MCL (A)	0.1	Table 2.3; MCL
146	2,4-D	70	70	CA Primary MCL (A)	70	Table 2.3; MCL
147	4,4'-DDT				No LARWQCB Limit	No LARWQCB Limit
148	Dieldrin				No LARWQCB Limit	No LARWQCB Limit
149	Diazinon	1.2	1.2	CA SWRCB Drinking Water NL (F) TBC	1.2	Table 2.5; NL
150	alpha-Endosulfan				No LARWQCB Limit	No LARWQCB Limit
151	beta-Endosulfan				No LARWQCB Limit	No LARWQCB Limit
152	Endrin	2	2	CA Primary MCL (A)	2	Table 2.3; MCL
153	Heptachlor	0.01	0.01	CA Primary MCL (A)	0.01	Table 2.3; MCL
154	Heptachlor Epoxide	0.01	0.01	CA Primary MCL (A)	0.01	Table 2.3; MCL (Heptachlor Epoxide)
155	Lindane	0.2	0.2	CA Primary MCL (A)	0.2	Table 2.3; MCL
156	Methoxychlor	30	30	CA Primary MCL (A)	30	Table 2.3; MCL
157	Thiobencarb	70	70	CA Primary MCL (A)	70/1	Table 2.3; MCL/Table 2.4 SMCL
158	Toxaphene	3	3	CA Primary MCL (A)	3	Table 2.3; MCL
159	2,4,5-TP (Silvex)	50	50	CA Primary MCL (A)	50	Table 2.3; MCL
160	Semi and non-volatile Organic					
161	1,2-Diphenylhydrazine				No LARWQCB Limit	No LARWQCB Limit
162	2,4-Dichlorophenol				No LARWQCB Limit	No LARWQCB Limit
163	2,4-Dimethylphenol				No LARWQCB Limit	No LARWQCB Limit
164	2,4-Dinitrophenol				No LARWQCB Limit	No LARWQCB Limit
165	2,4-Dinitrotoluene				No LARWQCB Limit	No LARWQCB Limit
166	2,4,6-Trichlorophenol				No LARWQCB Limit	No LARWQCB Limit
167	2-Chloronaphthalene				No LARWQCB Limit	No LARWQCB Limit
168	2-Chlorophenol				No LARWQCB Limit	No LARWQCB Limit
169	2-Methyl-4,6-Dinitrophenol				No LARWQCB Limit	No LARWQCB Limit
170	3,3-Dichlorobenzidine				No LARWQCB Limit	No LARWQCB Limit
171	Acenaphthalene				No LARWQCB Limit	No LARWQCB Limit
172	Alachlor	2	2	CA Primary MCL (A)	2	Table 2.3; MCL
173	Anthracene				No LARWQCB Limit	No LARWQCB Limit
174	Atrazine	1	1	CA Primary MCL (A)	1	Table 2.3; MCL
175	Bentazon	18	18	CA Primary MCL (A)	18	Table 2.3; MCL
176	Benzidine				No LARWQCB Limit	No LARWQCB Limit
177	Benzo(a)Anthracene				No LARWQCB Limit	No LARWQCB Limit
178	Benzo(a)Pyrene	0.2	0.2	CA Primary MCL (A)	0.2	Table 2.3; MCL
179	Benzo(b)Fluoranthene				No LARWQCB Limit	No LARWQCB Limit
180	Benzo(k)Fluoranthene				No LARWQCB Limit	No LARWQCB Limit
181	Bis(2-Chloroethyl)Ether				No LARWQCB Limit	No LARWQCB Limit

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DRAFT Chemical Specific ARARs/TBCs

	A	D	E	F	G	H
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2					LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
182	Bis(2-Chloroisopropyl)Ether				No LARWQCB Limit	No LARWQCB Limit
183	Bis(2-Ethylhexyl)Phthalate	4	4	CA Primary MCL (A)	4	Table 2.3; MCL
184	Butylbenzyl Phthalate				No LARWQCB Limit	No LARWQCB Limit
185	Carbofuran	18	18	CA Primary MCL (A)	18	Table 2.3; MCL
186	Chrysene				No LARWQCB Limit	No LARWQCB Limit
187	Dalapon	200	200	CA Primary MCL (A)	200	Table 2.3; MCL
188	Dibenzo(a,h)Anthracene				No LARWQCB Limit	No LARWQCB Limit
189	Diethyl Phthalate				No LARWQCB Limit	No LARWQCB Limit
190	Di(2-ethylhexyl)adipate	400	400	CA Primary MCL (A)	400	Table 2.3; MCL
191	Dimethyl Phthalate				No LARWQCB Limit	No LARWQCB Limit
192	Di-n-Butyl Phthalate			SWRCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
193	Dinoseb	7	7	CA Primary MCL (A)	7	Table 2.3; MCL
194	Diquat	20	20	CA Primary MCL (A)	20	Table 2.3; MCL
195	Endothall	100	100	CA Primary MCL (A)	100	Table 2.3; MCL
196	Fluoranthene				No LARWQCB Limit	No LARWQCB Limit
197	Fluorene				No LARWQCB Limit	No LARWQCB Limit
198	Glyphosate	700	700	CA Primary MCL (A)	700	Table 2.3; MCL
199	Hexachlorobenzene	1	1	CA Primary MCL (A)	1	Table 2.3; MCL
200	Hexachlorobutadiene				No LARWQCB Limit	No LARWQCB Limit
201	Hexachlorocyclopentadiene	50			50	Table 2.3; MCL
202	hexachloroethane				No LARWQCB Limit	No LARWQCB Limit
203	Indeno(1,2,3-cd) Pyrene				No LARWQCB Limit	No LARWQCB Limit
204	Isophorone				No LARWQCB Limit	No LARWQCB Limit
205	Molinate	20	20	CA Primary MCL (A)	20	Table 2.3; MCL
206	Naphthalene	17	17	CA SWRCB Drinking Water NL (F) TBC	17	Table 2.5; NL
207	Nitrobenzene				No LARWQCB Limit	No LARWQCB Limit
208	N-Nitrosodiethylamine	0.01	0.01	CA SWRCB Drinking Water NL (F) TBC	0.01	Table 2.5; NL
209	N-Nitrosodi-n-Propylamine	0.01	0.01	CA SWRCB Drinking Water NL (F) TBC	0.01	Table 2.5; NL
210	N-Nitrosodiphenylamine				No LARWQCB Limit	No LARWQCB Limit
211	Oxamyl	50	50	CA Primary MCL (A)	50	Table 2.3; MCL
212	Phenol				No LARWQCB Limit	No LARWQCB Limit
213	Picloram	500	500	CA Primary MCL (A)	500	Table 2.3; MCL
214	Propachlor	90	90	CA SWRCB Drinking Water NL (F) TBC	90	Table 2.5; NL
215	Pyrene				No LARWQCB Limit	No LARWQCB Limit
216	Simazine	4	4	CA Primary MCL (A)	4	Table 2.3; MCL
217	Miscellaneous Organic Constituents					
218	Di-isopropyl ether (DIPE)				No LARWQCB Limit	No LARWQCB Limit
219	2,3,7,8-TCDD (Dioxin)	3.00E-08	3.00E-08	CA Primary MCL (A)	0.00000003	Table 2.3; MCL

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2			Reference Limit (µg/L)	USEPA ARAR Reference ¹	LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
220	Tertiary butyl alcohol (TBA)	12	12	CA SWRCB Drinking Water NL (F) TBC	12	Table 2.5: NL
221	Total petroleum hydrocarbons			SWRCB Resolution 68-16	No LARWQCB Limit	No LARWQCB Limit
222	Analytes Historically Detected in SZ North Wells but not related to Site:					
223	Acetochlor					
224	Di-n-Octyl Phthalate					
225	Diphenamid					
226	Ethion					
227	Methane					
228	Metolachlor					
229	Prometryn					
230	Vinyl Acetate					
231						
232	Notes: Regarding Chemical-Specific ARARs or TBCs :					
233	Chemical-Specific ARAR					
234	Compounds noted with "Y(a)" in under Table 2 do not have containment levels specified and will require monitoring only per the 2005 ESD.					
235	1. Acetone was included as a COC in Table 1 of the 1998 IROD and should remain to be included in the chemical-specific ARARs list.					
236	2. Dichlorofluoromethane is listed in Table 2 of the 2005 ESD but does not have any containment level.					
237	Proposed Chemical-Specific TBC					
238	TBA and chemicals included in Basin Plan Objectives					
239						
240						
241	Notes:					
242	ARAR = Applicable or Relevant and Appropriate Requirements, California Regional Water Quality Control Board, Los Angeles Region					
243	CA = California					
244	DHS = Department of Health Services, California (now SWRCB Division of Drinking Water)					
245	ESD = Explanation of Significant Differences					
246	LA = Los Angeles					
247	LARWQCB = Los Angeles Regional Water Quality Control Board					
248	MCL = maximum contaminant level					
249	NA is defined by EPA as not applicable					
250	NC = Not calculated. Not historically present; assumed nondetection value					
251	NL = notification level					
252	NS = Not in current analytical list					
253	PHG = Public Health Goal					
254	SMCL = Secondary MCL					
255	SWRCB = State Water Resources Control Board - Division of Drinking Water					
256	TAL = target analyte list					
257	TBC = to be considered					

Table A

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2			Reference Limit (µg/L)	USEPA ARAR Reference¹	LARWQCB Permit Limit (µg/L)	Reference (Table in Attachment 2 of 6/29/2017 letter or in 12/19/13 Letter [Enclosure 3])
258	TCL = target compound list					
259	TDS = total dissolved solids					
260	USEPA = U.S. Environmental Protection Agency					
261	µg/L = microgram per liter					
262	(1) ARARs from August 2000 California EPA Compilation of Water Quality Goals and Updates through November 2001, updated through June 2003. Additional update based on RWQCB's ARARs provided on June 29, 2017.					
263	(2) California SWRCB required Detection Limit for Purposes of Reporting (DLR).					
264	(3) Hexavalent chromium State MCL (10 ug/L) repealed September 2017. However, PHG (0.02 ug/L) of 2011 remains in effect for drinking water.					
265	(4) <i>Discharge to groundwater aquifer shall also meet the MCLs for radionuclides specified in Tables 64442 and 64443 of Title 22 of the California Code of Regulation.</i>					
266	(A) CA Primary MCL for Drinking Water.					
267	(B) CA Secondary MCL for "Consumer Acceptance Contaminant Levels", specified in Table 64449-A of Section 64449 of Title 22 of the California Code of Regulation (CCR).					
268	(C) USEPA Primary MCL for Drinking Water.					
269	(D) USEPA Secondary MCL for Drinking Water.					
270	(E) CA Office of Environmental Health Hazard Assessment Public Health Goal for Drinking Water.					
271	(F) CA SWRCB Division of Drinking Water Notification levels (updated as of February 4, 2015) are TBCs					
272	(G) CA SWRCB Division of Drinking Water, Archived Advisory Action Level (as of January 30, 2015).					
273	(H) Other Taste and Odor Thresholds.					
274	(I) Drinking water equivalent level, U.S. EPA 2018 Edition of the Drinking Water Standards and Health Advisories Tables.					
275	(J) Water Quality Control Plan, Los Angeles Region (4), California Regional Water Quality Control Board.					
276						